ANCHOR QEA

614 Magnolia Avenue
Ocean Springs, Mississippi 39564
Phone 228.818.9626
Fax 228.818.9631

March 15, 2016

Gary Miller, Remedial Project Manager
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-RA)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Plan for Additional Cap Probing on the Time Critical Removal Action Armored Cap, San Jacinto River Waste Pits Superfund Site, Channelview, Texas

Dear Gary:

As part of the Time Critical Removal Action (TCRA) for the San Jacinto River Waste Pits (SJRWP) Site (Site), an armored cap was constructed adjacent to the San Jacinto River north of the Interstate 10 (I-10) bridge crossing. The cap has been subject to periodic inspections to document the presence and extent of armor rock, including visual inspection and bathymetric/topographic surveys. During the past several months, more detailed inspections of the cap have been conducted by the U.S. Environmental Protection Agency (USEPA) and the Respondents for the Site, McGinnes Industrial Maintenance Corporation and International Paper Company (Respondents).

In light our shared interest to ensure the protectiveness of the armored cap, the Respondents propose to conduct additional armor rock thickness probing to augment the data collected during the construction phase. These data will tighten the probing grid and provide a more robust assessment of the armor rock thickness. The following describes the proposed approach and procedures for completing the work, which will be added as additional work under Section 2.2 of the Operations, Monitoring and Maintenance Plan for the Time Critical Removal Action.

WORK APPROACH

The planned probe layout is provided on the attached Figure 1. Proposed new probe locations, depicted in dark green, will be spaced roughly equidistant from the post-construction probe locations shown in light green. Approximately 400 new locations are proposed for probing.

A differential GPS unit will be used to locate proposed sample stations. Once on station, a steel rod will be used to probe the armor cap. The probing team will use a 1/2- to 5/8-inch-diameter steel rod to measure armor thickness by penetrating the armor material until reaching the underlying geotextile fabric. If the probing team is unable to reach the geotextile below the armor material, the team will move the probing location a minimum distance possible to achieve successful penetration. Data, including waypoint IDs, thickness of armor cap, and sample times, will be recorded for each station.

A field summary report will be prepared and will include a figure showing each probing location. A table will also be provided with coordinates for each sample location.

SCHEDULE

The proposed work will begin during the week of March 14, 2016, subject to USEPA approval, if weather, tide, and access conditions allow those activities. Probing work is anticipated to take less than 1 week to complete.

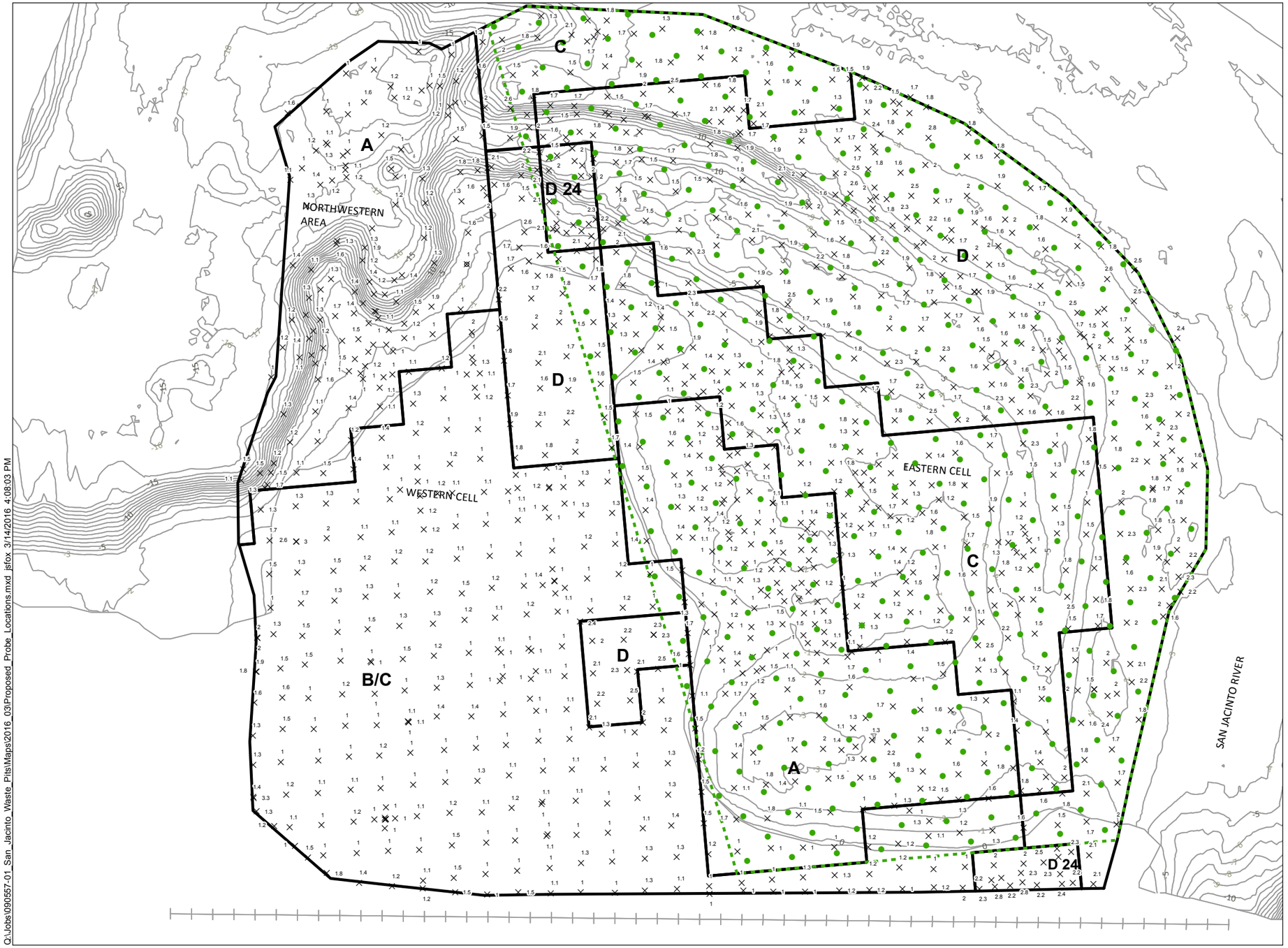
Please let us know if you have any concerns with the proposed vegetation control measures, and do not hesitate to contact me if you would like to discuss anything.

Sincerely,

David C. Keith

David C. Keith
Project Coordinator
Anchor QEA, LLC

Cc: Phil Slowiak, International Paper Company
Dave Moreira, McGinnes Industrial Maintenance Corporation
John Laplante, Anchor QEA, LLC



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LEGEND

- Proposed Probing Locations
- Probing Location and Thickness; Meets or Exceeds Minimum
- Pre-Construction Contour, February 15 and 21, 2011 (1-foot interval)
- Proposed New Probing Survey Boundary

Minimum Armor Thickness in Feet:

Area A	1
Area B/C	1
Area C	1
Area D	1.5
Area D24	2

Feet
0 50 100 150 200

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Figure 1
Proposed Supplemental Probing
San Jacinto Waste Pits Superfund Site